Walla Walla Public Schools

Technology Department
Rick Pummel, Network Engineer

September 16, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: **Modernizing the E-Rate Program for Schools and Libraries, WC Docket 13-184**

Dear Ms. Dortch,

I represent a mid-sized school district, in rural southeastern Washington state, in the city of Walla Walla. We have approximately 6,000 students spread across 10 schools, only one of which has had a F&R lunch count high enough in recent years to qualify for priority 2 funding. A number of our schools are in the 70-80% F&R range. As a result, our main E-Rate benefit in recent years has been funding for priority 1 services, not infrastructure.

We recently adopted a BYOD (bring your own device) policy to allow students and staff to use their own internet-capable devices at school. Many staff and students now have more convenient and timely internet access as a result. However, this is already beginning to cause significant growth in our internet bandwidth usage.

One of our challenges in the coming years will be to stay ahead of usage as it grows. These challenges will manifest themselves in both infrastructure needs and internet services.

In regard to infrastructure needs, probably our greatest issue is a rather severe lack of wireless infrastructure. Even though we have a BYOD policy, we do not have wireless internet connectivity everywhere in our district. Wireless access is simply not available in many locations. Out of our 10 schools, only 40% have comprehensive wireless access throughout the facility. The remaining 60% have various levels of coverage, all below what is needed. And, our local budget is not sufficient to meet the need anytime soon.

Below are comments related to the FCC's effort to modernize the E-rate program.

We believe:
- Universal access to broadband is necessary to meet school reform and improvement goals.
- The demand for access to broadband is growing rapidly beyond the ability of schools to provide it, despite the cost advantage possible through the E-rate discount.
- Given that most modern, low-cost internet devices require a wireless internet connection (as opposed to wired), and given that many schools do not yet have

pervasive wireless connectivity, infrastructure needs have now become what we consider a "priority 1" along with the internet service itself.

- A modernized E-rate program must be less burdensome for schools, and aligned more effectively to current and future K-12 education priorities. There is also a growing need to help schools plan and budget for technology hardware.
- Today's demand for the cost benefit of the E-rate program exceeds available funding. Clearly, the amount of money available for schools must increase to meet state and local needs. Funding only of schools with 90% or greater F&R count is not sufficient or equitable.

I also suggest that the gift rules be removed or perhaps heavily modified. While the intention of the rules was noble, they are troublesome to deal with in practice. We believe:

- The E-Rate competitive bidding rules are sufficient to weed out biases which may result through gifting.
- The banning of gifting is preventing the donation of useful services and equipment which would benefit schools at no cost to the tax payer or the E-Rate program.
- The ban on gifting prevents vendors from maintaining a normal relationship with the customer (us) throughout the year, outside the E-Rate process. For example, if vendor X would like to sponsor a lunch meeting in order to accommodate busy schedules, they will not do, as it violates the gifting rules. Instead, school staff must pay for the lunch out of their own pocket, or forego the lunch meeting altogether.

We agree that it is time to modernize the E-rate program and support positive change that benefits K-12 schools. We encourage you to move quickly as you complete your deliberations.

If you have any further questions about our district, please do not hesitate to contact me via email at rpummel@wwps.org or via phone at 509-526-6746.

Sincerely,

Rick Pummel
Network Engineer